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February 3, 2017
VIA ECF AND E-MAIL

The Honorable Katherine B. Forrest, U.S.D.J.
United States District Court
500 Pearl Street, Room 1950
New York, New York 10007

Re: *PaySys International, Inc. v. Atos SE, et al*, Case No. 14-cv-10105 (KBF)

Dear Judge Forrest:

We represent Defendants in the above-referenced action. Pursuant to Section 1.G. of Your Honor's Individual Rules of Practice in Civil Cases, we write with Plaintiff's consent to request a brief extension of the fact discovery deadline to March 17, 2017 to accommodate depositions of the parties' fact witnesses and a corresponding extension of the expert discovery deadline. No requests to extend discovery deadlines have been made since the Court's December 27, 2016 Order reset the deadlines. (Dkt. 239.)

The parties have been diligently working together to schedule and complete depositions of the parties' witnesses prior to the current February 28, 2017 fact discovery deadline. (Dkt. 239 at ¶ 1.) The parties' witnesses are all located outside of this district, including in London, Paris, Bratislava, Hong Kong, Malaysia, and Singapore. Due to various scheduling conflicts, and the health concerns and travel restrictions of several witnesses, the parties respectfully request a brief extension of the deadline to complete fact witness depositions and expert discovery by the following proposed dates.

1. **March 17, 2017**: Close of fact discovery
2. **April 10, 2017**: Close of expert discovery
 - a. March 20: Opening reports due
 - b. April 3: Rebuttal reports due
 - c. April 10: Sur-rebuttal reports due

The remaining deadlines in the Court's Order (Dkt. 239) will not be impacted by this request.

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Respectfully submitted,

DLA Piper LLP (US)

/s/ Leon Medzhibovsky

Leon Medzhibovsky

cc: Counsel of Record via ECF and E-Mail
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